# 1 Introduction

Saint-Gobain Containers, Inc. (SGCI) operates a glass container manufacturing facility located in Dolton, Illinois (see Figure 1). The facility (I.D. No. 031069AAI) is authorized to operate under CAAPP Permit No. 95090177, issued on June 26, 2001, by the Illinois Environmental Protection Agency (IEPA), as a major source of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM). The Dolton plant is located in Cook County, which is designated as attainment with the National Ambient Air Quality Standards (NAAQS) for all pollutants except for ozone (moderate nonattainment for the 8-hour standard) and fine particulate matter known also as PM<sub>2.5</sub> (nonattainment with the 24-hour standard). The facility is an existing major source under Prevention of Significant Deterioration (PSD) permitting requirements, since emissions of at least one attainment pollutant exceed the PSD major source threshold. It is also a major source under Nonattainment New Source Review (NNSR) permitting requirements for ozone and for PM<sub>2.5</sub>.

SGCI is submitting this application for a construction permit according to the requirements in 35 Illinois Administrative Code (IAC) 201.152 to authorize the upcoming modification of Furnaces #1, #2, and #3 at the Dolton facility. The proposed project will include the installation of emission controls including a dry scrubber, electrostatic precipitator (ESP), and selective catalytic reduction (SCR) to control SO<sub>2</sub>, PM, and NO<sub>x</sub> emissions, respectively, from the Furnaces. At this time SGCI is considering the use of an integrated ceramic filter system (ceramic filter technology with upstream alkali injection) to achieve SO<sub>2</sub>, PM, and NO<sub>x</sub> emission reductions in lieu of the dry scrubber, ESP, and SCR represented in this application. SGCI recently received approval for the use of alternative technology from USEPA Region V (a copy of the approval letter is located in Appendix C). If an alternative technology is chosen, then SGCI will amend this application with the new control equipment information and any revisions to process monitoring parameters that are needed. A change in the proposed emission control technology would not affect the post-project emission rates as they are currently described.

In addition to the installation of controls, the project will include rebuilds of Furnaces #1 and #3 and the delimiting of the existing production capacity limit placed on Furnace #2. As a result of this project, Furnace #1 will increase in capacity from 255 tpd to 383 tpd. The design capacity of Furnace #2 will not be increased, however SGCI is requesting the removal of the capacity limit previously imposed on Furnace #2 under permit 11100030, issued May 7, 2012. Furnace #3 will remain at the current design capacity. The increase in emissions related to the project will be below the levels triggering NNSR or PSD permitting requirements.

SGCI entered into a global consent decree with USEPA and several states, including Illinois, which was entered by the United States District Court for the Western District of Washington at Seattle on May 7, 2010 (the "GCD"). SGCI also seeks to incorporate certain requirements and limitations enumerated in the GCD for Furnaces #1, #2, and #3 into the construction permit issued for this project. Under the GCD, SGCI is required to operate the proposed dry scrubber, ESP, and SCR or alternative emission controls no later than December 31, 2014.

# 2 Facility and Source Description

The Dolton facility is a glass manufacturing plant with three regenerative, natural gas-fired glass melting furnaces. A process flow diagram for the furnace operations is included in Figure 2.

Raw materials, including silica (sand), limestone, soda ash, cullet (recycled glass), and lesser quantities of refining agents, colorants, and decolorizers are received at the site and unloaded into the material handling system. Generally, the aggregate raw materials are first transferred to a receiving hopper and then sent to storage silos via a bucket elevator. Cullet is obtained both on-site from recycled scrap and off-site from third party recycling centers and other similar sources. From the storage silos, the raw materials are transferred through a gravity feed system to a weigh hopper before being combined according to the batch specification in a mixer, thoroughly mixed, and conveyed to storage bins above the furnace. The combined material is then continuously fed into the furnaces via the furnace feeders. The raw material feed operation is automated such that a preset level of molten glass is maintained in the furnaces.

In the Furnace melters, the raw materials are melted into molten glass. Heat to maintain the glass in a molten state is supplied by natural gas and submerged electrodes (electric boost). The Dolton Furnaces are each a regenerative type, where the furnace firing occurs in cycles in order to recover waste heat. During the first cycle, the furnace exhaust is routed through a set of regenerator chambers lined with checker bricks on one side of the furnace. The bricks recover residual heat from the furnace exhaust. During the second phase, the exhaust flow is reversed and the incoming combustion air is passed through the heated regenerator chambers so it is pre-heated before entering the melter. During each cycle, the exhaust gases are routed to a stack which emits to the atmosphere. Each Furnace currently vents through two stacks (one for each firing cycle), but as a result of this project the three furnace exhausts will be combined and routed through the planned emission controls prior to discharge through a single stack.

As raw material enters each furnace melter, it floats on top of the molten glass already in the furnace. The material subsequently melts into molten glass, and is refined (removal of trapped gases and bubbles) and homogenized within the melter. Nearly bubble-free molten glass is continually withdrawn from each furnace into the distributor and then flows through shallow refractory channels called forehearths, each of which leads to one of the two individual glass container production lines, or "shops", associated with each of the furnaces (Shops #11 and #12, #21 and #22, and #31 and #32, respectively). The distributor and forehearths are natural gas-fired to provide heat conditioning and temperature control of the molten glass during transfer.

From each forehearth, the glass is cut into sections (gobs) by a set of shears. The gobs enter the Individual Section (IS) glass forming machines, where each gob is formed into a glass container within a mold. A mold swabbing compound is applied to the mold surface to keep the glass from sticking. After the containers are formed and released from the molds, they are conveyed to an exterior coating operation (hot end coating), where an organotin compound is applied to the container exteriors to strengthen the glass and prevent abrasions. The containers

are then conveyed through natural gas-fired annealing lehrs (one for each shop), which reheat the containers slightly then cool them at a controlled rate. This process removes unwanted stress created in the forming process and promotes container strength.

Once cooled, the containers are inspected, packed, and shipped to customers. Damaged or off-spec containers are transferred to the batch plant to be recycled back into the process as cullet after crushing.

# 3.5 GCD Requirement Incorporation

As mentioned in Section 1, SGCI entered into a GCD on May 7, 2010. Whenever SGCI is required to obtain a Permit for the purpose of complying with the GCD, the GCD specifies that the permitting agency shall "...include in the Permit for the installation of control devices, monitoring devices and the contemporaneous Furnace rebuild project the emission controls, emission limits, averaging periods, monitoring requirements, compliance determination, and compliance schedule set forth..." in the GCD [GCD, Section VIII.30]. Since the proposed project will trigger certain requirements and limitations enumerated in the GCD, SGCI requests that these requirements and limitations be incorporated into the construction permit and operating permit issued for this project.

Pursuant to these GCD provisions, Section 6 of this application provides a listing of the permit conditions SGCI proposes to satisfy the requirements of the GCD that apply to the Dolton Furnaces.

# 4 Project Emissions

Because the proposed project involves the modification of the Dolton Furnaces and associated emission units as well as the addition of new emission units (the emergency generator, the soda ash silo and the ESP dust silo), the resulting changes in emissions were estimated to determine the project emissions increases and to confirm that the PSD and NNSR permitting requirements are not applicable. A summary of the project emissions increase for each pollutant is provided in Table 1. Detailed emission estimates and a compilation of the emission factors used to calculate emissions are provided in Appendix B.

Baseline Actual Emissions of pollutants that are regulated under PSD (CO, PM,  $PM_{10}$ ,  $H_2SO_4$  mist, and GHG) and Past Actual Emissions of pollutants that are regulated under NNSR ( $NO_x$ ,  $PM_{2.5}$ ,  $SO_2$  as a  $PM_{2.5}$  precursor, and VOM) were calculated using the facility's average annual production rates (tons pulled) during the 24-month period from January 2010 through December 2011. The Baseline Actual/Past Actual emission calculations are provided on page 13 of Appendix B. Furnace emissions were determined using the applicable glass pull rate, combined with emission factors either developed from stack testing data or taken from AP-42, as described below.

| Pollutant                                    | Pre-project Furnace Emission Factor Basis  |
|--|--|
| PM / PM <sub>10</sub> /<br>PM <sub>2.5</sub> | Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace prior to or during the baseline period (tests conducted 09/2009 and 07/2011). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). All CPM is assumed to be PM <sub>10</sub> and PM <sub>2.5</sub> . PM <sub>10</sub> and PM <sub>2.5</sub> factors also assume that 95% of FPM is FPM <sub>10</sub> and 91% of FPM is FPM <sub>2.5</sub> , consistent with AP-42 Table 11.15-3 for an uncontrolled furnace. |
| SO <sub>2</sub>                              | Emission factors are based on the stack tests performed at each Furnace during the baseline period (tests conducted 09/2009 and 07/2011). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.   |
| NO <sub>x</sub>                              | Furnace #1 emission factor is based on compliance testing performed 06/2008, since subsequent NO <sub>x</sub> testing has not been performed. The Furnace #2 and #3 NO <sub>x</sub> emission factors are based on the stack tests performed at each Furnace prior to or during the baseline period (tests conducted 09/2009 and 07/2011). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.   |
| H₂SO₄ mist                                   | Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 - 2011 timeframe.   |
| VOM, CO                                      | Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.   |

Baseline Actual/Past Actual emissions from the associated distributor, forehearths, and lehrs were estimated from fuel usage data and published AP-42 emission factors for natural gas

combustion (Tables 1.4-1 and 1.4-2). Baseline Actual/Past Actual emissions from mold swabbing, hot end coating, material handling, and the batch mixers were estimated based on the past material consumption data and emission factors for these operations.

Future Projected Actual Emissions of pollutants that are regulated under PSD and Future Permitted Emissions of pollutants that are regulated under NNSR were calculated based on Furnace #1 increasing its design capacity by 50% and Furnace #2 and Furnace #3 operating without a change to their current design capacities. The Future Projected Actual/Future Permitted emission calculations are provided on page 14 of Appendix B. Furnace emissions were determined using the applicable glass pull rate, combined with the emission factors reflecting the ESP, dry scrubber, and SCR controls as described below.

| Pollutant   | Post-project Furnace Emission Factor Basis  |
|---|---|
| PM / PM <sub>10</sub> /<br>PM <sub>2.5</sub>  | Post-project emission factors for FPM from each Furnace are based on the GCD limit [IV.9.c]. TPM factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM <sub>10</sub> and PM <sub>2.5</sub> factors also assume that 75% of FPM is FPM <sub>10</sub> and 53% of FPM is FPM <sub>2.5</sub> , consistent with AP-42 Table 11.15-3 for an ESP-controlled furnace. |
| SO <sub>2</sub> Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO <sub>2</sub> concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, based on the inlet SO <sub>2</sub> concentrations at each Furnatiaken from the most recent stack test results. |   |
| NO <sub>x</sub>   | As specified by GCD, IV.7.d.ii.   |
| H₂SO₄ mist  | Post-project emission factor is based on recent stack testing results of other SGCI furnaces with SO <sub>2</sub> controls while accounting for expected variability of furnace operation.  |
| VOM, CO   | Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.  |

Future Projected Actual/Future Permitted emissions from the associated distributor, forehearths, and lehrs were estimated from the post-project natural gas use (increased from their baseline rates in proportion to the increase in pre- to post-project furnace production) and published AP-42 emission factors for natural gas combustion (Tables 1.4-1 and 1.4-2). Future Projected Actual/Future Permitted emissions from mold swabbing, hot end coating, material handling, and the batch mixers were estimated based on the post-project material consumption (also increased from their baseline rates in proportion to the increase in pre- to post-project furnace production) and the respective emission factors for these operations.

Future Projected Actual/Future Permitted emissions of particulate were calculated for the proposed scrubber silo and ESP dust silo using emission factors from AP-42, Table 11.26-1 for storage bin loading. The emission estimates conservatively assume that PM $_{10}$  and PM $_{2.5}$  emissions are equivalent to total PM emissions. The material throughput for the soda ash reagent stored in the scrubber silo assumes that the reagent will be injected at a level 50% greater than the stoichiometrically required amount for the expected pre-control SO $_2$  emissions. The material throughput for the ESP dust silo conservatively assumes that the entire amount of

sodium sulfate formed in the dry scrubber and excess soda ash reagent injected into the dry scrubber will be removed by the ESP in addition to the Furnace PM emissions.

Future Projected Actual/Future Permitted emissions for the proposed emergency generator were calculated based on an annual operating time of 500 hr/yr according to guidance provided by USEPA ("Calculating Potential to Emit for Emergency Generators" (September 6, 1995). PM, NO<sub>x</sub>, and CO emissions were calculated using factors corresponding to the allowable limits for Tier 2 engines at 40 CFR 60.4202(a)(2). NO<sub>x</sub> emissions conservatively assume that the NO<sub>x</sub> emission factor is equal to the non-methane hydrocarbon plus NO<sub>x</sub> Tier 2 limit, and the VOM factor is based on the Tier 1 allowable limit for total hydrocarbons.

Exhibit 270-1 Applicable Rules Summary - Emergency Generator Saint-Gobain Containers, Inc. Dolton, Illinois

Emissions Standards or Limitations Applicable to the Emission Unit Regulated Air Pollutant(s)

| Regulated Air Pollutant(s)        | Emission Standard(s)                 | Requirement(s)   |
|-----------------------------------|--------------------------------------|--|
| NOx, PM, CO, VOM, SO <sub>2</sub> | 40 CFR 60.4205(b)                    | Meet the applicable emission standards of 40 CFR 89.112 and 89.113 as follows: PM: 0.20 g/kW-hr, CO: 3.5 g/kW-hr, NOx + NMHC: 6.4 g/kW-hr, opacity: 20% during acceleration mode, 15% during lugging mode, 50% during peaks in either acceleration or lugging mode             |
| NOx, PM, CO, VOM, SO <sub>2</sub> | 40 CFR 60.4207(a) and (b)            | Use diesel fuel certified to the standards in 40 CFR 80.510(b)   |
| NOx, PM, CO, VOM, ${ m SO}_2$     | 40 CFR 60.4211(a);<br>40 CFR 60.4206 | Operate and maintain the engine according to manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer over the life of the engine; only change those settings that are permitted by the manufacturer. |
| NOx, PM, CO, VOM, SO <sub>2</sub> | 40 CFR 60.4211(c)                    | Comply with emission standards by purchasing a certified engine. Install and configure the engine according to the manufacturer's specifications   |
| NOx, PM, CO, VOM, SO <sub>2</sub> | 40 CFR 60.4211(e)                    | Maintenance checks and readiness testing limited to 100 hours per year; No limit on the use of the engine in emergency situations.   |
| HAPs                              | 40 CFR 63.6590(c)                    | For new stationary RICE located at an area source of HAP, meet MACT Subpart ZZZZ requirements by meeting the requirements of 40 CFR 60 Subpart IIII. No further requirements under Subpart ZZZZ apply.   |

|  | Requirement(s)             |     |
|--|----------------------------|-----|
| Emission Unit                            | Recordkeeping Rule(s)      |     |
| Recordkeeping Rules Applicable to the El | Regulated Air Pollutant(s) | N/A |

| negarateu An Fondianija)  | veconoveeping varels) | vequi ement(s)   |
|---|-----------------------|--|
| N/A   |                       |  |
| Reporting Rules Applicable to the Emission Unit<br>Regulated Air Pollutant(s) | Reporting Rule(s)     | Requirement(s)   |
| N/A   |                       |  |
| Monitoring Rules Applicable to the Emission Unit                              |                       |  |
| Regulated Air Pollutant(s)  | Monitoring Rule(s)    | Requirement(s)   |
| NOX, PM, CO, VOM, SO <sub>2</sub>   | 40 CFR 60.4209(a)     | Install a non-resettable hour meter prior to startup of the engine |
|   |                       |  |

|   | Requirement(s)             |     |  |
|---|----------------------------|-----|--|
|   | Testing Rule(s)            |     |  |
| Testing Rules Applicable to the Emission Unit | Regulated Air Pollutant(s) | N/A |  |

# Appendix B

# **Emission Estimates**

Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications PSD/NNSR Applicability Analysis

Signature: MMW Checked by: JGB/BED Date Calc Made Final: 9/13/2012

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| Pollutarit        | Project-Related Emissions<br>Increase<br>(lpy) | PSD/NNSR Significance<br>Threshold<br>(Ipy) | Netting Analysis Required?<br>(yes/no) | Net Emissions<br>increase/Decrease<br>(tpy) | Major Modification?<br>(yes/no) |
|-------------------|--|---|--|---|---------------------------------|
| PM                | 10.69  | 25  | NO                                     | NA  | NO                              |
| PM <sub>10</sub>  | 9.11   | 15  | NO                                     | NA  | NO                              |
| NO <sub>2</sub> 1 | 9.85   | 40  | NO                                     | NA  | NO                              |
| со                | 20.43  | 100   | NO                                     | NA  | NO                              |
| H₂SO₄ Mist        | 0.00   | 7   | ИО                                     | NA  | NO                              |
| CO₂e²             | 47,236   | 75,000                                      | МО                                     | NA  | NO                              |
| GHG <sup>2</sup>  | 47,199   | 0   | NO                                     | NA NA                                       | МО                              |
| NO <sub>X</sub>   | 9.85   | 40  | ОИ                                     | NA  | NO                              |
| VOM               | 13.86  | 40  | NO                                     | NA  | NO                              |
| SO <sub>2</sub>   | 1.60   | 40  | NO                                     | NA  | NO                              |
| PM <sub>2.5</sub> | 9.08   | 10  | NO                                     | NA  | NO                              |

Notes:

The review for NO<sub>2</sub> is performed using total NO<sub>X</sub>, which provides a conservative analysis. NO<sub>2</sub> is anticipated to be a small fraction of NO<sub>X</sub>.

<sup>&</sup>lt;sup>2</sup> For GHG and CO<sub>2</sub>e emissions, netting is only required if both CO<sub>2</sub>e and GHG emissions are greater than the applicable threshold.



# Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related PM Emission Changes

Signature: MMW
Checked by: JGB/BED

Date Calc Made Final: 9/13/2012 Page: 2

| Source                        | Baseline or Past Actual<br>Emissions (tpy) <sup>1,2</sup> | Post-Project Emissions<br>(tpy) 3.4 | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>6</sup> |
|-------------------------------|---|-------------------------------------|---|
| Fumace No. 1                  | 18.74   | 20.27                               | 1.53  |
| Fumace No. 2                  | 18.54   | 16.86                               | -1.67   |
| Furnace No. 3                 | 21.28   | 14.78                               | -6,50   |
| Distributors/Forehearths - #1 | 0,28  | 0.54                                | 0.26  |
| Distributors/Forehearths - #2 | 0.24  | 0.38                                | 0.13  |
| Distributors/Forehearths - #3 | 0.27  | 0,36                                | 0.10  |
| Material Handling             | 0.01  | 0.02                                | 0.01  |
| Lehrs - Furnace #1            | 0.03  | 0.06                                | 0.03  |
| Lehrs - Furnace #2            | 0,03  | 0.05                                | 0.02  |
| Lehrs - Furnace #3            | 0.04  | 0.05                                | 0.01  |
| Mold Swab - Fumace #1         | 3.90  | 7.43                                | 3.53  |
| Mold Swab - Furnace #2        | 3.57  | 5,53                                | 1,97  |
| Mold Swab - Furnace #3        | 3,91  | 5.35                                | 1.45  |
| Hot End Coating - Furnace #1  | 0.84  | 1,59                                | 0.76  |
| Hot End Coating - Furnace #2  | 0.76  | 1.19                                | 0,42  |
| Hot End Coating - Furnace #3  | 0.83  | 1.14                                | 0.31  |
| Mixers - Furnace #1           | 1.24  | 1.28                                | 0.05  |
| Mixers - Furnace #2           | 1.23  | 1.25                                | 0,02  |
| Mixers - Furnace #3           | 1.23  | 1.25                                | 0.02  |
| Emergency Generator           | 0   | 0.08                                | 0.08  |
| Scrubber Silo                 | 0   | 0.002                               | 0.002   |
| ESP Dust Silo                 | 0   | 0.005                               | 0.005   |
|                               | P   | roject-Related Increases:           | 10.69   |
|                               | Project-Related Decreases:                                |                                     | -8.17   |
|                               |   | Significance Threshold:             | 25  |
|                               | Ne  | tting Analysis Required?            | NO  |

<sup>&</sup>lt;sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>0</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>25</sub>, SO<sub>2</sub>, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

PM / PM<sub>10</sub> / PM<sub>25</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCl's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM<sub>0</sub> and PM<sub>25</sub> factors also assume that 95% of FPM is FPM<sub>10</sub> and 91% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3.

- SO<sub>2</sub>: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 10/1/09 and 7/28 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 10/1/09 and 7/28 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- H<sub>2</sub>SO<sub>4</sub> mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 2011 timeframe.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

PM / PM<sub>10</sub> / PM<sub>25</sub>: Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit [IV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM<sub>10</sub> and PM<sub>25</sub> factors also assume that 75% of FPM is FPM<sub>10</sub> and 53% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3 for an ESP-controlled Furnace.

SO<sub>2</sub>: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO<sub>2</sub> concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO<sub>2</sub> concentrations at each Furnace taken from the most recent stack test results.

NOx: As specified by GCD, IV.7.d.ii.

H<sub>2</sub>SO<sub>4</sub> mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO<sub>2</sub> controls while accounting for expected variability of Furnace operation.

The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:

<sup>&</sup>lt;sup>3</sup> Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>0</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM<sub>5</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.

<sup>&</sup>lt;sup>4</sup> Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:

<sup>&</sup>lt;sup>5</sup> Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions (for pollutants regulated under NNSR).



Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related PM<sub>10</sub> Emission Changes

Signature: MMW
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| Source                        | Baseline or Past Actual<br>Emissions (tpy) <sup>1,2</sup> | Post-Project Emissions<br>(tpy) <sup>34</sup> | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>5</sup> |
|-------------------------------|---|---|---|
| Furnace No. 1                 | 17.97   | 16.78   | -1.20   |
| Fumace No, 2                  | 17.78   | 14.31   | -3.47   |
| Furnace No. 3                 | 20.42   | 12.32   | -8,10   |
| Distributors/Forehearths - #1 | 0.28  | 0,54  | 0.26  |
| Distributors/Forehearths - #2 | 0.24  | 0.38  | 0.13  |
| Distributors/Forehearths - #3 | 0.27  | 0.36  | 0.10  |
| Material Handling             | 0.01  | 0,02  | 0.01  |
| Lehrs - Fumace #1             | 0.03  | 0.06  | 0.03  |
| Lehrs - Furnace #2            | 0.03  | 0.05  | 0.02  |
| Lehrs - Furnace #3            | 0.04  | 0.05  | 0.01  |
| Mold Swab - Furnace #1        | 3.90  | 7.43  | 3.53  |
| Mold Swab - Furnace #2        | 3.57  | 5.53  | 1.97  |
| Mold Swab - Furnace #3        | 3.91  | 5.35  | 1.45  |
| Hot End Coating - Furnace #1  | 0.84  | 1.59  | 0.76  |
| Hot End Coating - Furnace #2  | 0.76  | 1,19  | 0.42  |
| Hot End Coating - Furnace #3  | 0.83  | 1.14  | 0.31  |
| Mixers - Fumace #1            | 1.21  | 1.23  | 0.02  |
| Mixers - Furnace #2           | 1.21  | 1.22  | 0.01  |
| Mixers - Furnace #3           | 1.21  | 1,22  | 0.01  |
| Emergency Generator           | 0   | 0.08  | 0.08  |
| Scrubber Silo                 | 0   | 0.002   | 0.002   |
| ESP Dust Silo                 | 0   | 0.005   | 0.005   |
|                               | P   | Project-Related Increases:                    |   |
|                               | Pr  | oject-Related Decreases:                      | -12.77  |
|                               |   | Significance Threshold:                       |   |
|                               | Ne  | tting Analysis Required?                      | NO  |

<sup>&</sup>lt;sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>25</sub>, SO<sub>2</sub>, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:

PM / PM<sub>10</sub> / PM<sub>25</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM <sub>10</sub> and PM<sub>2.5</sub> factors also assume that 95% of FPM is FPM<sub>10</sub> and 91% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3.

- SO<sub>2</sub>: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 10/1/09 and 7/28 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 10/1/09 and 7/28 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- H<sub>2</sub>SO<sub>4</sub> mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGl's fleet (producing Flint or Georgia Green glass) over the 2010 2011 timeframe.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

- <sup>3</sup> Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.
- <sup>4</sup> Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:

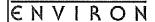
PM / PM<sub>10</sub> / PM<sub>25</sub>: Post-project emission factors for filterable PM (FPM) from each Fumace are based on the GCD limit [IV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Fumace #1, 39.4% of TPM for Fumace #2, and 33.3% of TPM for Fumace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM <sub>10</sub> and PM<sub>25</sub> factors also assume that 75% of FPM is FPM<sub>10</sub> and 53% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3 for an ESP-controlled Fumace.

SO<sub>2</sub>: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO<sub>2</sub> concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO<sub>2</sub> concentrations at each Furnace taken from the most recent stack test results.

NOx: As specified by GCD, IV.7.d.ii.

H<sub>2</sub>SO<sub>4</sub> mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO<sub>2</sub> controls while accounting for expected variability of Furnace operation.

<sup>&</sup>lt;sup>5</sup> Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Past Actual Emissions (for pollutants regulated under NNSR).



Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related PM<sub>2.5</sub> Emission Changes

Signature: MMW Checked by: JGB/BED Date Calc Made Final: 9/13/2012 Page: 4

Project-Related Baseline or Past Actual Post-Project Emissions Emissions Source Increase/Decrease Emissions (tpy)1,2 (tpy) 3,4 (tpy)<sup>6</sup> Fumace No. 1 17.36 13.70 -3.66 17.18 12.06 -5.12 Fumace No. 2 Furnace No. 3 19.73 10.15 -9.57 Distributors/Forehearths - #1 0.28 0.54 0.26 Distributors/Forehearths - #2 0.24 0.38 0.13 Distributors/Forehearths - #3 0.27 0,36 0.10 Material Handling 0.01 0.02 0.01 Lehrs - Furnace #1 0.03 0.06 0.03 Lehrs - Furnace #2 0.03 0.05 0.02 Lehrs - Fumace #3 0.04 0.05 0.01 Mold Swab - Fumace #1 3.90 7.43 3.53 Mold Swab - Furnace #2 3.57 5.53 1.97 Mold Swab - Fumace #3 3.91 5.35 1,45 Hot End Coating - Furnace #1 0.84 1,59 0.76 Hot End Coating - Furnace #2 0.76 1.19 0.42 Hot End Coating - Furnace #3 0.83 1.14 0.31 Mixers - Furnace #1 1.188 1.192 0.003 Mixers - Furnace #2 1.188 1.190 0.002 Mixers - Furnace #3 1,188 1,190 0.601 Emergency Generator 0 0.083 0.083 Scrubber Silo 0 0.002 0.002 ESP Dust Silo 0 0,005 0.005 Project-Related Increases 9.08 Project-Related Decreases

18.36

10

NO

PM / PM<sub>10</sub> / PM<sub>25</sub>. Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 -10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM 10 and PM25 (actors also assume that 95% of FPM is FPM10 and 91% of FPM is FPM25, consistent with AP-42 Table 11.15-3.

Significance Threshold

Netting Analysis Required?

SO2: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughout during the period of time over the project baseline when each factor was in effect.

NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

H2SO4 mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 - 2011 timeframe

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

PM / PM 19 P of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM 10 and PM25 factors also assume that 75% of FPM is FPM10 and 53% of FPM is FPM25, consistent with AP-42 Table 11.15-3 for an ESP-controlled Furnace.

SO2: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO2 concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO2 concentrations at each Furnace taken from the most recent stack test results. NOx: As specified by GCD, IV.7.d.ii.

H2SO4 mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO2 controls while accounting for expected variability of Furnace operation.

<sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PMto H<sub>2</sub>SO<sub>4</sub> mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PMz, SO2, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:

<sup>3</sup> Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.

<sup>4</sup> Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:

<sup>5</sup> Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Past Actual Emissions (for pollutants regulated under NNSR).

Saint-Gobain Containers, Inc.
Dolton Furnace #1 & #2 & #3 Modifications
Project-Related SO<sub>2</sub> Emission Changes

Signature: MMW
Checked by: JGB/BED

Date Catc Made Final: 9/13/2012

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| Source                        | Baseline or Past Actual<br>Emissions (tpy) <sup>12</sup>                            | Post-Project Emissions<br>(tpy) <sup>3,4</sup> | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>5</sup> |
|-------------------------------|---|--|---|
| Furnace No. 1                 | 37.02   | 38.58  | 1.56  |
| Furnace No. 2                 | 48.83   | 41.45  | -7,37   |
| Furnace No. 3                 | 71.60   | 53.71  | -17.89  |
| Distributors/Forehearths - #1 | 0.02  | 0.04   | 0.02  |
| Distributors/Forehearths - #2 | 0.02  | 0,03   | 0.01  |
| Distributors/Forehearths - #3 | 0.02  | 0.03   | 0.01  |
| Lehrs - #1                    | 0.002   | 0,004  | 0.002   |
| Lehrs - #2                    | 0.002   | 0,004  | 0.001   |
| Lehrs - #3                    | 0.003   | 0.004  | 0.001   |
| Emergency Generator           | 0   | 0.003  | 0.003   |
|                               | Project-Related Increases:<br>Project-Related Decreases:<br>Significance Threshold: |  | 1.60  |
|                               |   |  | -25.26  |
|                               |   |  | 40  |
|                               | Net   | NO   |   |

<sup>&</sup>lt;sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>to</sub>, H<sub>2</sub>SO₄ mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>to</sub>, SO₂, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

PM / PM<sub>10</sub> / PM<sub>25</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across GGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM 10 and PM<sub>2.5</sub> factors also assume that 95% of FPM is FPM<sub>10</sub> and 91% of FPM is FPM<sub>2.5</sub>. consistent with AP-42 Table

SO<sub>2</sub>: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

H<sub>2</sub>SO<sub>4</sub> mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green class) over the 2010 - 2011 timeframe.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

PM / PM<sub>10</sub> / PM<sub>25</sub> Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit [IV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM 10 and PM<sub>25</sub> factors also assume that 75% of FPM is FPM<sub>10</sub> and 53% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3 for an ESP-controlled Furnace.

SO<sub>2</sub>: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO<sub>2</sub> concentration less than 157 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO<sub>2</sub> concentrations at each Furnace taken from the most recent stack test results.

NOx: As specified by GCD, IV.7.d.ii.

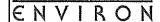
H<sub>2</sub>SO<sub>4</sub> mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO<sub>2</sub> controls while accounting for expected variability of Furnace operation.

<sup>&</sup>lt;sup>2</sup> The Furgace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:

<sup>&</sup>lt;sup>3</sup> Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM<sub>25</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.

<sup>&</sup>lt;sup>4</sup> Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:

<sup>&</sup>lt;sup>5</sup> Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Basetine Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Past Actual Emissions (for pollutants regulated under NNSR).



# Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related NO<sub>2</sub> Emission Changes

Signature: MMW Checked by: JGB/BED Date Calc Made Final: 9/13/2012

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| Source                        | Baseline or Past Actual<br>Emissions (tpy) <sup>1,2</sup> | Post-Project Emissions<br>(tpy) 3.4 | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>6</sup> |
|-------------------------------|---|-------------------------------------|---|
| Furnace No. 1                 | 143.19  | 90.87                               | -52.32  |
| Furnace No. 2                 | 107.91  | 66.43                               | -41.48  |
| Furnace No. 3                 | 171,84  | 64.06                               | -107.79   |
| Distributors/Forehearths - #1 | 3.74  | 3.74 7.11                           |   |
| Distributors/Forehearths - #2 | 3.21  | 4.97                                | 1.77  |
| Distributors/Forehearths - #3 | 3.50  | 4,79                                | 1,30  |
| Lehrs - #1                    | 0.39  | 0.75                                | 0.355   |
| Lehrs - #2                    | 0.41  | 0,63                                | 0.225   |
| Lehrs - #3                    | 0.50  | 0.69                                | 0.187   |
| Emergency Generator           | 0   | 2,646                               | 2.646   |
|                               | P   | Project-Related Increases:          |   |
|                               | Pr  | Project-Related Decreases:          |   |
|                               |   | Significance Threshold:             |   |
|                               | Ne  | Netting Analysis Required?          |   |

<sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PMo, H2SO4 mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM25, SO2, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

<sup>2</sup> The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:
PM / PM<sub>10</sub> / PM<sub>25</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 -10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PMo and PM2s factors also assume that 95% of FPM is FPM10 and 91% of FPM is FPM2s, consistent with AP-42 Table 11.15-3.

SO2: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

H<sub>2</sub>SO<sub>4</sub> mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 - 2011 timeframe.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

PM / PM<sub>10</sub> / PM<sub>25</sub>: Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit [IV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM<sub>0</sub> and PM<sub>25</sub> factors also assume that 75% of FPM is FPM<sub>10</sub> and 53% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11,15-3 for an ESP-controlled Furnace.

SO2: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SQ: concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SQ concentrations at each Furnace taken from the most recent stack test results.

NOx: As specified by GCD, IV.7.d.ii.

H2SO4 mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO2 controls while accounting for expected variability of Furnace operation.

Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>0</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM2.5, SO2, and VOM) are future permitted emissions.

Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:

<sup>5</sup> Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Past Actual Emissions (for pollutants regulated under NNSR).

# Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related CO Emission Changes

Signature: MMW
Checked by: JGB/BED

Date Calc Made Final: 9/13/2012

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| Source                        | Baseline or Past Actual<br>Emissions (tpy) <sup>1,2</sup> | Post-Project Emissions<br>(tpy) <sup>3,4</sup> | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>5</sup> |  |  |
|-------------------------------|---|--|---|--|--|
| Fumace No. 1                  | 7.34  | 13.98  | 6.64  |  |  |
| Furnace No. 2                 | 6,59  | 10.22  | 3.63  |  |  |
| Furnace No. 3                 | 7.19  | 9.86   | 2.55  |  |  |
| Distributors/Forehearths - #1 | 3.14  | 5.97<br>4,18                                   | 2.84<br>1.48  |  |  |
| Distributors/Forehearths - #2 | 2.69  |  |   |  |  |
| Distributors/Forehearths - #3 | 2.94  | 4.03   | 1.09  |  |  |
| Lehrs - #1                    | 0.33  | 0.63   | 0.30  |  |  |
| Lehrs - #2                    | 0.34  | 0.53   | 0.19  |  |  |
| Lehrs - #3                    | 0.42  | 0.58   | 0.16  |  |  |
| Emergency Generator           | 0   | 1.45   | 1.45  |  |  |
| _                             | P   | Project-Related increases:                     |   |  |  |
|                               | Project-Related Decreases:                                |  | 0.00  |  |  |
|                               |   | Significance Threshold:                        |   |  |  |
|                               | Ne Ne   | tting Analysis Required?                       | NO  |  |  |

<sup>&</sup>lt;sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>0</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

<sup>2</sup> The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:

PM / PM<sub>10</sub> / PM<sub>26</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM<sub>0</sub> and PM<sub>25</sub> factors also assume that 95% of FPM is FPM<sub>10</sub> and 91% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3.

- SO<sub>2</sub>: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 10/1/09 and 7/28 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 10/1/09 and 7/28 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- H<sub>2</sub>SO<sub>4</sub> mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 2011 timeframe,

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

- <sup>3</sup> Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>0</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.
- <sup>4</sup> Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:
- PM / PM<sub>10</sub> / PM<sub>25</sub>: Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit [IV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM<sub>10</sub> and PM<sub>25</sub> factors also assume that 75% of FPM is FPM<sub>10</sub> and 53% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3 for an ESP-controlled Furnace.
- SO<sub>2</sub>: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO<sub>2</sub> concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO<sub>2</sub> concentrations at each Furnace taken from the most recent stack test results.

  NOx: As specified by GCD, IV.7.d.ii.
- H<sub>2</sub>SO<sub>4</sub> mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO<sub>2</sub> controls while accounting for expected variability of Furnace operation.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

<sup>5</sup> Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions (for pollutants regulated under NNSR).

### Saint-Gobain Containers, Inc.

Dolton Furnace #1 & #2 & #3 Modifications Project-Related H<sub>2</sub>SO<sub>4</sub> Mist Emission Changes

Signature: MMW
Checked by: JGB/BED

Date Calc Made Final; 9/13/2012

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| Source        | Baseline or Past Actual<br>Emissions (tpy) <sup>1,2</sup> | Post-Project Emissions<br>(tpy) <sup>3,4</sup> | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>5</sup> |
|---------------|---|--|---|
| Furnace No. 1 | 8.74  | 6.99   | -1.75   |
| Furnace No. 2 | 7.84  | 5.11   | -2.73   |
| Furnace No. 3 | 8.56  | 4.93   | -3.63   |
|               | Pi  | roject-Related Increases:                      | 0.00  |
|               | Pro   | oject-Related Decreases:                       | -8.12   |
|               |   | Significance Threshold:                        | 7   |
|               | Ne  | tting Analysis Required?                       | NO  |

<sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>0</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

PM / PM<sub>10</sub> / PM<sub>25</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM<sub>0</sub> and PM<sub>25</sub> factors also assume that 95% of FPM is FPM<sub>10</sub> and 91% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3.

SO<sub>2</sub>: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

H<sub>2</sub>SO<sub>4</sub> mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 - 2011 timeframe.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

PM / PM<sub>10</sub> / PM<sub>25</sub>: Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit [iV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM<sub>10</sub> and PM<sub>25</sub> factors also assume that 75% of FPM is FPM<sub>10</sub> and 53% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11, 15-3 for an ESP-controlled Furnace.

SO<sub>2</sub>: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SQ concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SQ concentrations at each Furnace taken from the most recent stack test results.

NOx: As specified by GCD, IV.7.d.ii,

H<sub>2</sub>SO<sub>4</sub> mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO<sub>2</sub> controls while accounting for expected variability of Furnace operation.

<sup>&</sup>lt;sup>2</sup> The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:

<sup>&</sup>lt;sup>3</sup> Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>0</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.

<sup>&</sup>lt;sup>4</sup> Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:

<sup>&</sup>lt;sup>5</sup> Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Past Actual Emissions (for pollutants regulated under NNSR).

# Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related CO<sub>2</sub>e Emission Changes

Signature: MMW Date Calc Made Final: 9/13/2012
Checked by: JGB/BED Page: 9

| Source                        | Baseline Actual<br>Emissions (tpy) <sup>1</sup> | Post-Project Emissions (tpy) <sup>2,2</sup> | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>4</sup> |
|-------------------------------|---|---|---|
| Furnace No. 1 & No. 2 & No. 3 | 56,347  | 94,561                                      | 38,213  |
| Distributor/Forehearths/Lehrs | 14,125  | 22,790                                      | 8,665   |
| Emergency Generator           | 0   | 105   | 105   |
| Scrubber Sorbent Reaction     | 0   | 253   | 253   |
|                               | CO₂e  | Project-Related Increases:                  | 47,236  |
|                               | CO <sub>z</sub> e F                             | roject-Related Decreases:                   | 0   |
|                               | CO  | ₂e Significance Threshold:                  | 75,000  |
|                               | GHG   | Project Related Increases:                  | 47,199  |
|                               | GH  | G Significance Threshold:                   | 0   |
|                               | N   | letting Analysis Required?                  | NO  |

<sup>\*</sup> Netting only required if both GHG and CO2e are greater than the applicable thresholds.

<sup>&</sup>lt;sup>1</sup> Baseline Actual CO<sub>2</sub>(e) Emissions from natural gas combustion are calculated using the facility's average natural gas consumption rates (MMscf) during the 24-month baseline period from January 2010 through December 2011. The Tier 1 calculation methodology specified in 40 CFR 98 Subpart C is used. Baseline Actual CQe) Emissions from glass production are calculated using the facility's average material feed rates (ton/yr charged) during the 24-month baseline period from January 2010 through December 2011. The calculation methodology specified in 40 CFR 98 Subpart N is used.

<sup>&</sup>lt;sup>2</sup> Post-project emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>2</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>25</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.

<sup>&</sup>lt;sup>3</sup> Post-Project Emissions are calculated based on natural gas and diesel fuel consumption rates and material feed rates increased in proportion to the increased glass pull rate for Furnaces #1, #2, and #3. Emissions of CO<sub>2</sub>(e) from natural gas combustion, diesel combustion, and sorbent injection are calculated according to the methodologies specified in 40 CFR 98 Subpart C; emissions of CO<sub>2</sub>(e) from glass production are calculated according to the methodologies specified in 40 CFR 98 Subpart N.

<sup>&</sup>lt;sup>4</sup> Project-Related Emissions Increase/Decrease = Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD)
Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Baseline Actual Emissions (for pollutants regulated under NNSR).

# Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related GHG Emission Changes

Signature: MMW Date Calc Made Final: 9/13/2012
Checked by: JGB/BED Page: 10

| Source                        | Baseline Actual<br>Emissions (tpy) <sup>1</sup> | Post-Project Emissions<br>(tpy) <sup>2,3</sup> | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>4</sup> |
|-------------------------------|---|--|---|
| Furnace No. 1 & No. 2 & No. 3 | 56,302  | 94,488   | 38,185  |
| Distributor/Forehearths/Lehrs | 14,112  | 22,768   | 8,657   |
| Emergency Generator           | 0   | 104  | 104   |
| Scrubber Sorbent Reaction     | 0   | 253  | 253   |
|                               | GHG F   | roject-Related Increases:                      | 47,199  |
| <b>.</b>                      | GHG P   | roject-Related Decreases:                      | 0   |
| Ī                             | GH  | 3 Significance Threshold:                      | 0   |
| j                             | CO₂e F  | roject-Related Increases:                      | 47,236  |
| ľ                             | CO₂   | e Significance Threshold:                      | 75,000  |
| Ī                             | No.   | tting Analysis Required?                       | NO  |

<sup>\*</sup> Netting only required if both GHG and CO2e are greater than the applicable thresholds.

<sup>&</sup>lt;sup>1</sup> Baseline Actual GHG Emissions from natural gas combustion are calculated using the facility's average natural gas consumption rates (MMscf) during the 24-month baseline period from January 2010 through December 2011. The Tier 1 calculation methodology specified in 40 CFR 98 Subpart C is used. Baseline Actual GHG Emissions from glass production are calculated using the facility's average material feed rates (ton/yr charged) during the 24-month baseline period from January 2010 through December 2011. The calculation methodology specified in 40 CFR 98 Subpart N is used.

<sup>&</sup>lt;sup>2</sup> Post-project emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>D</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>D</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.

<sup>&</sup>lt;sup>3</sup> Post-Project Emissions are calculated based on natural gas and diesel fuel consumption rates and material feed rates increased in proportion to the increased glass pull rate for Furnaces #1, #2, and #3. Emissions of CO<sub>Z</sub>(e) from natural gas combustion, diesel combustion, and sorbent injection are calculated according to the methodologies specified in 40 CFR 98 Subpart C; emissions of CO<sub>Z</sub>(e) from glass production are calculated according to the methodologies specified in 40 CFR 98 Subpart N.

<sup>&</sup>lt;sup>4</sup> Project-Related Emissions Increase/Decrease = Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD)
Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Baseline Actual Emissions (for pollutants regulated under NNSR).

### Saint-Gobain Containers, Inc. ENVIRON Dolton Furnace #1 & #2 & #3 Modifications Project-Related NO<sub>x</sub> Emission Changes Date Calc Made Final: 9/13/2012 Signature: MMW Checked by: JGB/BED Page; 11 Project-Related Baseline or Past Actual Post-Project Emissions **Emissions** Emissions (tpy)<sup>1,2</sup> (tpy) 3.4 Increase/Decrease (tpy)<sup>6</sup> -52.32 Furnace No. 1 143.19 90.87 Furnace No. 2 107.91 66.43 -41.48 Fumace No. 3 171.84 64.06 -107.79 Distributors/Forehearths - #1 3.74 7.11 3.38 Distributors/Forehearths - #2 3.21 4.97 1.77 1.30 Distributors/Forehearths - #3 3.50 4.79 Lehrs - #1 0.39 0.75 0.36 Lehrs - #2 0.41 0.63 0.22 Lehrs - #3 0.50 0.69 0.19

2.65

9.85

-201.59

NO

0

PM / PM<sub>10</sub> / PM<sub>26</sub>; Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 -10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM 10 and PM25 factors also assume that 95% of FPM is FPM10 and 91% of FPM is FPM25, consistent with AP-42 Table 11.15-3.

2.65 Project-Related Increases:

Project-Related Decreases:

Significance Threshold: Netting Analysis Required?

- SO.: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 10/1/09 and 7/28 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/26 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.
- H<sub>2</sub>SO<sub>4</sub> mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 - 2011 timeframe.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

- 3 Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants regulated under NNSR (NOx, PM25, SO2, and VOM) are future permitted emissions.
- 4 Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 . #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:
- PM / PM<sub>10</sub> / PM<sub>25</sub>: Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit [IV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM 10 and PM25 factors also assume that 75% of FPM is FPM10 and 53% of FPM is FPM25, consistent with AP-42 Table 11.15-3 for an ESP-controlled Furnace.
- SO2: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO2 concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO2 concentrations at each Furnace taken from the most recent stack test results.

NOx: As specified by GCD, IV.7.d.ii.

Emergency Generator

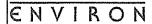
H2SO4 mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO2 controls while accounting for expected variability of Furnace operation.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

5 Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Past Actual Emissions (for poliutants regulated under NNSR).

<sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>25</sub>, SO<sub>2</sub>, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following:



# Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Project-Related VOM Emission Changes

Signature: MMW Checked by: JGB/BED Date Calc Made Final: 9/13/2012

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| Source                        | Baseline or Past Actual<br>Emissions (tpy) <sup>12</sup> | Post-Project Emissions<br>(tpy) <sup>3,4</sup> | Project-Related<br>Emissions<br>Increase/Decrease<br>(tpy) <sup>5</sup> |
|-------------------------------|--|--|---|
| Fumace No. 1                  | 7.34   | 13.98  | 6.64  |
| Furnace No. 2                 | 6.59   | 10.22  | 3.63  |
| Furnace No. 3                 | 7.19   | 9.86   | 2.66  |
| Distributors/Forehearths - #1 | 0.21   | 0.39   | 0.19  |
| Distributors/Forehearths - #2 | 0.18   | 0.27   | 0.10  |
| Distributors/Forehearths - #3 | 0.19   | 0.26   | 0.07  |
| Lehrs - #1                    | 0.02   | 0,04   | 0.020   |
| Lehrs - #2                    | 0.02   | 0.03   | 0.012   |
| Lehrs - #3                    | 0.03   | 0.04   | 0.010   |
| Emergency Generator           | 0  | 0,54   | 0.54  |
|                               | P:   | roject-Related Increases:                      | 13.86   |
|                               | Pro  | oject-Related Decreases:                       | 0.00  |
|                               |  | Significance Threshold:                        | 40  |
|                               | l Nei  | tting Analysis Required?                       | NO  |

<sup>&</sup>lt;sup>1</sup> Baseline Actual Emissions of pollutants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) and Past Actual Emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOx, PM<sub>25</sub>, SO<sub>2</sub>, and VOM) are calculated using the facility's average annual glass production rates (tons pulled) during the 24-month period from January 2010 through December 2011.

<sup>2</sup> The Furnace emission factors used to calculate Baseline Actual or Past Actual Emissions are the following: PM / PM<sub>10</sub> / PM<sub>25</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 -10/1/09 and 7/28 - 7/29/11). To derive a single FPM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) factor assumes that condensable PM (CPM) is 18.7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's fleet (producing Flint or Georgia Green glass and using 20% - 40% cullet). PM to and PM25 factors also assume that 95% of FPM is FPM to And 91% of FPM is FPM25, consistent with AP-42 Table

SO<sub>2</sub>: Emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughout during the period of time over the project baseline

NOx: Furnace 1 emission factor is based on compliance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace before or during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

H2SO4 mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 - 2011 timeframe.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

Post-project emissions of pollutants that are regulated under PSD (CO, PM, PM<sub>10</sub>, H<sub>2</sub>SO<sub>4</sub> mist, and GHG) are future projected actual emissions after the project. Post-project emissions of pollutants that are regulated under NNSR (NOx, PM<sub>2.5</sub>, SO<sub>2</sub>, and VOM) are future permitted emissions.

A Post-Project Emissions are calculated based on the post-project maximum annual pull rates for Furnaces #1 , #2, and #3. All other production rates are increased in proportion to the increased glass pull rate across the Furnaces. Post-project Furnace emission factors reflect GCD controls:

PM / PM<sub>10</sub> / PM<sub>25</sub>: Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit [IV.9.c]. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #1, 39.4% of TPM for Furnace #2, and 33.3% of TPM for Furnace #3, conservatively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM 10 and PM25 factors also assume that 75% of FPM is FPM10 and 53% of FPM is FPM25, consistent with AP-42 Table 11.15-3 for an ESP-controlled Furnace.

SO2: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SO2 concentration less than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO2 concentrations at each Furnace taken from the most recent stack test results. NOx: As specified by GCD, IV.7.d.ii.

H2SO4 mist: Post-project emission factor is based on recent stack testing results of other SGCI Furnaces with SO2 controls while accounting for expected variability of Furnace operation.

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

5 Project-Related Emissions Increase/Decrease = Future Projected Actual Emissions - Baseline Actual Emissions (for pollutants regulated under PSD) Project-Related Emissions Increase/Decrease = Future Permitted Emissions - Past Actual Emissions (for pollutants regulated under NNSR).

# *z* 0

Signature: MAW
Checked by: JGB/BED
Checked by: JGB/BED
Baseline Actual / Past Actual Emissions

Date Calc Made Final: 9/13/2012

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|--|----------------|------------------------|---------------------------------|------|------|-------------------|------|--------------------------------|--------------------------------|----------|----------|---------------------------------|-------|-------|--------------------|---------------|-----------|--|-------|-------|
|  |                | Baseline / Past Actual | ctual Throughput <sup>is)</sup> |      |      |                   | Emis | Emission Factors <sup>io</sup> | 1.5 <sup>(0)</sup>             |          |          |                                 |       | Base  | ine Actua          | / Past Ac     | tuai Emis | Baseline Actual / Past Actual Emissions (TPY | 7     |       |
| Process                                    | Material       | Quanlity               | Unit                            | Ą.   | o Mg | PM <sub>2.5</sub> | °os  | NOX                            | H <sub>x</sub> SO <sub>4</sub> | VOM      | 8        | EF Units                        | M.d.  | P.W.  | P!M <sub>2.5</sub> | လွ            | ΧÖN       | H <sub>2</sub> SO <sub>4</sub><br>Mist       | VOM   | 8     |
| Furnace #1                                 | Glass          | 73,431                 | tonlyr                          | 0.51 | 0.49 | 0.47              | 1.01 | 3.90                           | 0.24                           | 0.2      | 0.2      | lb/ton                          | 18,74 | 17,97 | 17.36              | 37,02         | 143.19    | 8.74   | 7.34  | 7,34  |
| Furnace #2                                 | Glass          | 65,895                 | tonlyr                          | 95'0 | 0,54 | 0,52              | 1,48 | 3,28                           | 0,24                           | 0,2      | 0,2      | 1b/ton                          | 18.54 | 17,78 | 17.18              | 48.83         | 107.91    | 7.84   | 6.59  | 6.59  |
| Furnace #3                                 | Glass          | 71,912                 | tonlyr                          | 0.59 | 0.57 | 0.55              | 1.99 | 4.78                           | 0.24                           | 0.2      | 0.2      | (p/lou                          | 21,28 | 20.42 | 19.73              | 71.60         | 171.84    | 8,55   | 7,19  | 7.19  |
| Furnace #1 - Forehearth / Distributors     | Natural Gas    | 74.7                   | mmcf/yr                         | 7.6  | 7.6  | 7.6               | 9,0  | 9                              | •                              | 5,5      | ž        | lb/mmscf                        | 0,28  | 0.28  | 0,28               | 0.02          | 3,74      | 1  | 0,21  | 3.14  |
| Furnace #2 - Forehearth / Distributors     | Natural Gas    | 64.2                   | шшсі/ус                         | 9.7  | 9.7  | 7.6               | 9.0  | 9                              | 1                              | 5.5      | 84       | lb/mmscf                        | 0.24  | 0.24  | 0.24               | 0.02          | 3.21      | 1  | 0.18  | 2.69  |
| Furnace #3 - Forehearth / Distributors     | Natural Gas    | 70.0                   | mmcf/yr                         | 7.6  | 7.6  | 9'2               | 9'0  | 6                              | ŧ                              | 5.5      | Z        | lb/mmscf                        | 0.27  | 0.27  | 0.27               | 0.02          | 3.50      | 1  | 0.19  | 2.94  |
| Material Handing                           | Material       | 2,891                  | lbs of Uncon PM                 | 0,0  | 0,0  | 0.0               | ı    | ı                              | 1                              | ı        | ı        | b/lb mat                        | 0.03  | 0.0   | 0.01               | 1             | ı         | 1  | ı     | i     |
| Furnace #1 - Lehrs                         | Natural Gas    | 7.87                   | mmcf/yr                         | 7.6  | 2,6  | 7.6               | 9.0  | 5                              | 1                              | 5,5      | 84       | lb/mmscf                        | 0.03  | 0.03  | 0.03               | 0.002         | 0,393     | ;  | 0,02  | 0,33  |
| Furnace #2 - Lehrs                         | Natural Gas    | 9,16                   | mmcf/yr                         | 7,6  | 7.6  | 7.6               | 9'0  | 5                              | :                              | 5,5      | #        | b/mmscf                         | 0,03  | 0.03  | 0,03               | 0,002         | 0,408     | :  | 0.02  | 0,34  |
| Furnace #3 - Lehrs                         | Malural Gas    | 10,08                  | mmcf/yr                         | 7.6  | 7.6  | 7.6               | 9.0  | 5                              | ı                              | 5.5      | \$       | b/mmscf                         | 0.0   | 0.04  | 7<br>0<br>0        | 0.003         | 0.504     | :  | 0.03  | 0.42  |
| Mold Swab - Furnace #1                     | Solvent        | 8,674                  |                                 | 0.9  | 6.0  | 0.9               | 1    | ſ                              | 1                              | ı        | ı        | b/tb mat                        | 3.90  | 3.90  | 3.90               | 1             | ı         | ı  | ı     | ;     |
| Mold Swab - Furnace #2                     | Solvent        | 7,929                  | lbs of material                 | 6.0  | 6.0  | 0.9               | ı    | ı                              | 1                              | ı        | 1        | b/fb mat                        | 3,57  | 3.57  | 3.57               | 1             | ı         | ı  | ,     | ;     |
| Mold Swab - Furnace #3                     | Solvent        | 8,679                  | lbs of malerial                 | 6.0  | 6.0  | 6.0               | :    | :                              | ı                              | 1        | :        | b/lb mat                        | 3.91  | 3.91  | 3.91               | :             | :         | :  | :     | :     |
| Hot End Coating - Fumace #1                | TC-100         | 6,968                  | lbs of malerial                 | 0,24 | 0.24 | 0.24              | :    | :                              | 1                              | :        | :        | b/lb mat                        | 0.84  | 0.84  | 0.84               | :             | :         | •  | :     | :     |
| Hot End Coaling - Furnace #2               | TC-100         | 6,372                  | lbs of malerial                 | 0.24 | 0.24 | 0.24              | ı    | ı                              | 1                              | ı        | ı        | b/lb mat                        | 9.76  | 0,76  | 9.76               | ı             | ı         | ı  | ı     | 1     |
| Hot End Coating - Furnace #3               | TC-100         | 6,908                  | lbs of malerial                 | 0.54 | 0.24 | 0.24              | :    | :                              | :                              | :        | :        | b/b mal                         | 0.83  | 0.83  | 0.83               | :             | :         | :  | :     | ;     |
| Furnace #1 - Mixers                        | Raw Materials  | 65,441                 | lbs of material                 | 0.15 | 0.07 | 0.01              | ı    | 1                              | ı                              |          | ı        | lb/ton                          | 1.24  | 1.21  | 1.19               | ı             | ı         | 1  |       |       |
| Furnace #2 - Mixers                        | Raw Malerials  | 58,719                 | lbs of material                 | 0.15 | 0.07 | 0.01              | :    | :                              | :                              | :        | :        | lb/ton                          | 1.23  | 1,21  | 1.19               | :             | :         | :  | :     | :     |
| Furnace #3 - Mixers                        | Raw Malerials  | 64,090                 | lbs of material                 | 0.15 | 0.07 | 0.01              | 1    | 1                              | 1                              | 1        | 1        | lb/ton                          | 1.23  | 1.21  | 1.19               | 1             | ;         | 1  | :     | ;     |
|  |                |                        |                                 |      |      |                   |      |                                | Tota                           | Baseline | Actual 3 | Total Baseline Actual Emissions | 76.97 | 74.51 | 72.55              | 157.51 434.69 |           | 25,15  | 21,77 | 30.99 |

Notes:

(a) Baseline Actual Emissions of poliulants that are regulated under Prevention of Significant Deterioration (PSD) (CC, PM, PM, no. HySO<sub>4</sub> mist, and GHS) and Past Actual Emissions of poliulants that are regulated under Prevention rates (lons pulled) during the 24-month period from January 2010 through December 2011. Emissions are calculated using the production rate over the baseline actual period applied to the respective emission factor.

(b) Emission factors are taken from the following:

-Glass Furnaces
PM / PM<sub>1,5</sub>: Emission factors for filterable PM (FPM) are based on the stack tests performed at each Furnace during the baseline period (tests conducted \$1.29 - 10/1/09 and 7/29 - 7/29/11). To derive a single FPM in the filter of time over the project baseline when each factor was in effect. Total PM factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. Total PM (TPM) at 18,7% of TPM, based on 2010-2011 compliance test results for the group of similar regenerative Furnaces across SGCI's faet (producing Flint or Georgia Green glass and using 20% - 40% cuilet). FM in and PM<sub>1,5</sub> lactors also assume that 95% of FPM is FPM in and 91% of FPM is FPM in and 91% of FPM is FPM in and 91% of FPM in FPM in FPM in and 91% of FPM in FPM in and 91% of FPM in FPM in and 91% of FPM in FPM in FPM in and 91% of FPM in FPM in and 91% of FPM in FPM in FPM in and 91% of FPM in FPM i

SO2, Emission factors are based on the stack tests performed at each Furnace during the baseline period (tests conducted 9/29 - 10/1/09 and 7/28 - 7/29/11). To derive a single factor for each Furnace, the factors from the stack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect. NOx: Furnace 1 emission factor is based on compilance testing performed on 6/4/08, since subsequent NOx testing has not been performed on the Furnace. The Furnace 2 and 3 NOx emission factors are based on the stack tests performed at each Furnace during the baseline period (tests conducted 9/29 - 10/1/09 and 7/29/11). To derive a single factor for each Furnace, the factors from the slack tests are weighted based on the relative glass throughput during the period of time over the project baseline when each factor was in effect.

HySO4, mist: Emission factor is derived from the average of stack testing results for the group of similar regenerative Furnaces across SCGI's fleet (producing Flint or Georgia Green glass) over the 2010 - 2011

VOM, CO: Emission factors per AP-42, Section 11.15, Table 11.15-2, 10/86.

Factors from AP-42, Tables 1.4-1 and 1.4-2.

-Mold Swab, Hot End Coaling
Emission factors are updated compared to those used previously in CAAPP Permit 95090177 (Conditions 7.2,12,a and 7,3,12,a) and construction permit 07050050, based on updated information regarding operations. Hot end coaling factor reflects the use of C4 hoods at the Dotton facility.

Mixers

Uncaptured emissions are calculated based on a capture efficiency of: 95% using the uncontrolled emission factor shown.

Captured emissions are calculated based on a total dust collector design air flow of: 10,500 cfm and a collector outlet grain leading of yCAAPP Permit 95090177 Condition 7,6,12.a. Emissions are based on hours of operation and will not increase as a result of the proposed project since raw material handling: Emissions are eactualed continuously during the basedine period.

# Date Calc Made Final; 9/13/2012 Post-Project Emissions (TPY) 1 1 2.65 0.003 ဂ္ဂိ 1.19 1.19 1.19 0.08 0.002 0.005 0.005 7.43 5.53 1.59 1.19 22,280,000 bymmscf bymmscf byb mat bylb mat bylb mat bylb mat bylb mat bylb mat bylb mat bylo mat lb/mmscf lb/lb mat 0.2 0.2 0.2 5.5 5.5 5.5 5.5 5.5 111111111121: H<sub>2</sub>SO<sub>4</sub> Emission Factors<sup>it</sup> š 1888 0.00738 80, 21.55 21.81 1.09 0.6 0.6 0.6 0.6 0.6 0.20 Σ α, kW 1,000 lb materiallyr 1,000 lb materiallyr bs of materiallyr lbs of Uncon PM tonlyr tonlyr tonlyr mmcflyr mmcflyr mmcf/yr T STEEL Post-Project Throughput Throughput 13.82 16,514 12,298 11,894 13,266 9,883 9,467 124,584 87,630 750 1,214 383 tpd 139,795 102,200 18,550 142 99 96 4,660 14,98 Raw Materials Raw Materials Raw Materials Glass Glass Glass Glass Natural Gas Natural Gas Material Natural Gas Diesel fuel Particulate Particulate Solvent TC-100 TC-100 Material Solvent Solvent Signature: MMW Checked by: JGB/BED Z Furnace #2 Furnace #2 Furnace #1 - Forehearth / Diskributors Furnace #2 - Forehearth / Diskributors Furnace #3 - Forehearth / Diskributors Material Handling O Post-Project Emissions Funace #3 - Lehrs Mold Swab - Funace #1 Mold Swab - Funace #2 Mold Swab - Funace #2 Mold Swab - Funace #2 Hold End Coaling - Funace #1 Hol End Coaling - Funace #2 Hol End Coaling - Funace #2 $\alpha$ Process Emergency Generator Scrubber Silo -umace #1 - Mixers urnace #2 - Mixers urnace #3 - Mixers Furnace #2 - Lehrs Furnace #1 - Lehrs >

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(a) Post-project emissions of politizants that are regulated under Prevention of Significant Deterioration (PSD) (CO, PM, PM no. H<sub>3</sub>SO<sub>4</sub> mist, and GHG) are future Projected Actual Emissions after the project.

Post-project emissions of pollutants that are regulated under Non-attainment New Source Review (NNSR) (NOX, PM 2.s. SO2,, and VOM) are future Permitled Emissions.

(b) Post-Project emission factors are taken from the following: -Glass Furnace

PM / PW<sub>19.7</sub>; Post-project emission factors for filterable PM (FPM) from each Furnace are based on the GCD limit IV.9-cl. Total PM (TPM) factor assumes that CPM is 31% of TPM for Furnace #3, conservalively assuming that CPM emissions remain unchanged from the results of the most recent stack tests. PM 10 and PM<sub>13</sub> factors also assume that 75% of FPM is FPM<sub>10</sub> and 53% of FPM is FPM<sub>25</sub>, consistent with AP-42 Table 11.15-3 for an ESP-controlled Furnace.

SQ2: Post-project emission factors are based on the GCD limit of 50 ppm (for a pre-control SQ2 concentration lass than 167 ppmv) and on the expected performance of the dry scrubber to be installed as part of the proposed project, given the expected inlet SO2 concentrations at each Furnace taken from the most recent stack test results.

HySO4 mist: Post-project emission factor is based on recent stack testing results of other SGC! Furnaces with SO 2 controls white accounting for expected variability of Furnace operation. NOx: As specified by GCD, IV.7.d.ii.

VOM, CO: Factors from AP-42, Table 11.15-2.

-Forehearths / Distributor / Lehr

Factors from AP-42, Tables 1,4-1 and 1,4-2.

-Motd Swab, Hot End Coaling

Emission factors are updated compared to those used previously in CAAPP Permit 95090177 (Conditions 7.2.12.a and 7.3.12.a) and construction permit 07050050, based on updated information regarding operations. Hot end coaling factor reflects the use of C4 hoods at the Dolton facility.

- Mixers

Uncaptured emissions are calculated based on a capture efficiency of.

Captured emissions are calculated based on a total dust collector design air flow of:

10,520 cfm

and a collector outlet grain loading of:

- Material Handing: Emissions are exclusived as exclusived by Permil 95090177 Condition 7.6.12.a. Emissions are based on hours of operation and will not increase as a result of the proposed project since raw material handing was operated confinuously during the baseline period.

Emission factors from AP-42, Table 11.26-1 for storage bin loading. Factors conservatively assume PM = PM 10 = PM<sub>2.5</sub>.

Scrubber Silo and ESP Silo

Dolton Furnace #1 & #2 & #3 Modifications Saint-Gobain Containers, Inc. Baseline Actual CO2e Emission Calculations

> Checked by: JGB/BED Signature: MMW

BASELINE ACTUAL GHG EMISSIONS CALCULATIONS

Date Calc Made Final: 9/13/2012 Page: 15

Subpart C Tier 1 CO<sub>2</sub> Calculation Methodology (Eq. C-1) 51,131.67 urnace CO2e

CO<sub>2</sub> = 1x10<sup>-3</sup> \* Fuel \* HHV \* EF

Natural Gas

|             | (based on annual average actual NG usage during baseline period) (default value from Table C-1) (default value from Table C-1) |
|-------------|--|
| metric tons | scf<br>MMBtu/scf<br>kg CO2/MMBtu   |
| 42,193.49   | 774,127,785<br>1.028E-03<br>53.02  |
| = CO2 =     | Fuel =<br>HHV =<br>EF =  |
|             |  |

Subpart C CH<sub>4</sub> and N<sub>2</sub>O Calculation Methodology (Eq. C-8) CH<sub>4</sub> or N<sub>2</sub>O = 1x10<sup>3</sup> + Fuel \*HHV \* EF

CO<sub>2</sub>e = Emissions in metric tons/yr \* Global Warming Potential

Natural Gas

|          | 3WP <sub>CH4</sub> = 21 |                    | GWP <sub>N2O</sub> = 310                | based on annual average actual NG usage during baseline period) | default value from Table C-1) | default value from Table C-2) | default value from Table C-2) |
|----------|-------------------------|--------------------|---|---|-------------------------------|-------------------------------|-------------------------------|
| ons      | ons                     |                    | Ă                                       | ĺ   |                               |                               |                               |
| metric t | metric tons             | metric t           | metric t                                | scl   | MMBtu                         | kg CH4                        | kg N2O                        |
| 0.80     | 16.71                   | 0.08               | 24.67                                   | 774,127,785   | 1.028E-03                     | 1.00E-03                      | 1.00E-04                      |
| CH₄ =    | CO₂e for CH₄=           | N <sub>2</sub> O = | CO <sub>2</sub> e for N <sub>2</sub> O= | Fuel =  | = NHH                         | EF <sub>CH4</sub> =           | EF <sub>NZO</sub> =           |
|          |                         |                    |   |   |                               |                               |                               |

Subpart N CO<sub>2</sub> Calculation Methodology for Use of Carbonate-Based Raw Materials
For purposes of estimating baseline emissions, the CO<sub>2</sub> emissions are calculated using the average usage of each carbonate-based material charged to each furnace over the baseline period.

| 8,897  |         |  |
|--------|---------|--|
|        |         | *F   |
|        |         | $*EF_i*F_i$                                  |
|        |         | *  |
| Eco2 = |         | 2000   |
| ш      |         | *'W  |
|        |         | N  |
|        |         | $o_2 = \sum_{i=1}^n MF_i * \left( M \right)$ |
|        |         | ~[.]=  |
|        |         | = =  |
|        | Eq. N-1 | 3co2 =                                       |
|        | Е       | 山  |

Where:

 $E_{\rm CO2}$  = Process emissions of  ${\rm CO_2}$  from the furnace (metric tons)

n = Number of carbonate-based raw materials charged to the furnace
Annual average mass fraction of carbonate-based mineral "r" in carbonate-based raw material "r" (percentage, expressed as a decimal)
MF<sub>1</sub> = NOTE; a value of 1.0 can be used as an alternative to data provided by the raw material supplier.

M<sub>i</sub> = Annual amount of carbonate-based raw material "i" charged to furnace (tons)

2000/2205 = Conversion factor to convert tons to metric tons

Ef, = Emission factor for carbonate-based raw material "T", (metric ton CO<sub>2</sub> per metric ton carbonate-based raw material as shown in Table N-1 to Subpart N)

F<sub>i</sub> = Fraction of calcination achieved for carbonate-based raw material "", assume to be equal to 1.0 (percentage, expressed as a decimal)

|   |                              | The mass fraction of carbonate-based mineral in the raw | material (MF) was conservatively assumed to be 100% to estimate emissions. |  |
|---|------------------------------|---|--|--|
| Tons/Year<br>Charged to<br>Furnaces #3  | 10,192                       | 0   | 12,144   |  |
| Tons/Year Charged Tons/Year Charged to to Furnace #1 Furnaces #2                      | 9,640                        | 0   | 11,486   |  |
| Tons/Year Charged<br>to Furnace #1  | 10,473                       | 0   | 12,532   |  |
| CO <sub>2</sub> Emission Factor<br>(metric tons CO <sub>2</sub> /metric ton material) | 0.440                        | 0.477   | 0.415  | vd.  |
| Raw Material  | Limestone- CaCO <sub>3</sub> | Dolomite- CaMg(CO <sub>3</sub> ) <sub>2</sub>           | Sodium-carbonate/<br>soda ash-NA <sub>2</sub> CO <sub>3</sub>              | * Average annual usage during baseline period. |

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Saint-Gobain Containers, Inc.

Dolton Furnace #1 & #2 & #3 Modifications Baseline Actual CO2e Emission Calculations Date Calc Made Final: 9/13/2012 Page: 16

Checked by: JGB/BED

DistributorForehearths/Lehrs GOZe = 12.817.90

Subpart C Tier 1 CO<sub>2</sub> Calculation Methodology (Eq. C-1)

CO<sub>2</sub> = 1x10<sup>3</sup> + Fuel \* HHV \* EF

Natural Goze

(based on annual average actual NG usage during baseline period) (default value from Table C-1) (default value from Table C-1) CO<sub>2</sub>e = Emissions in metric tons/yr \* Global Warming Potential scf MMBtu/scf kg CO2/MMBtu metric tons 12,805.35 234,940,804 1.028E-03 53.02 Subpart C CH<sub>4</sub> and N<sub>2</sub>O Calculation Methodology (Eq. C-8) CH<sub>4</sub> or N<sub>2</sub>O = 1x10<sup>3</sup> + Fuel \*HHV \* EF CO<sub>2</sub>= Fuel= HHV = EF= Natural Gas

(based on annual average actual NG usage during baseline period) (default value from Table C-1) (default value from Table C-2) (default value from Table C-2) 310 21 GWP<sub>N2O</sub> = GWP<sub>CH4</sub> = scf MMBtu/scf kg CH4/MMBtu kg N2O/MMBtu metric tons metric tons metric tons metric tons 0.24 0.02 7.49 224,940,804 1.028E-03 1.00E-03 CO<sub>2</sub>e for CH<sub>4</sub>= N<sub>2</sub>O = CO<sub>2</sub>e for N<sub>2</sub>O= Fuel = HHV = EF<sub>CH4</sub> = Natural Gas

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Saint-Gobain Containers, Inc. Dolton Furnace #1 & #2 & #3 Modifications Projected Actual CO2e Emission Calculations Date Calc Made Final: 9/13/2012

Checked by: JGB/BED Signature: MMW

PROJECTED ACTUAL GHG EMISSIONS CALCULATIONS

Subpart C Tier 1 CO<sub>2</sub> Calculation Methodology (Eq. C-1) CO<sub>2</sub> = 1x10<sup>-3</sup> + Fuel \* HHV \* EF

Natural Gas

(based on projected actual annual production) (default value from Table C-1) (default value from Table C-1) scf MMBtu/scf kg CO2/MMBtu metric tons 1,262,338,139 1.028E-03 53.02 68,803.18 CO2 = Fuel = HHV = EF =

Subpart C CH₄ and N2O Calculation Methodology (Eq. C-8)

CH4 or N2O = 1x10-3 \* Fuel \*HHV \* EF

CO<sub>2</sub>e = Emissions in metric tons/yr \* Global Warming Potential

(based on projected actual annual production) (default value from Table C-1) (default value from Table C-2) (default value from Table C-2) 310 21 GWP<sub>CH4</sub> = GWP<sub>N2O</sub> = kg N2O/MMBtu kg CH4/MMBtu scf MMBtu/scf metric tons metric tons metric tons metric tons 1,262,338,139 1.028E-03 1.00E-03 1.00E-04 27.25 0.13 40.23 1.30 Fuel = HHV = EF<sub>CH4</sub> = EF<sub>NZO</sub> = CH4= N<sub>2</sub>O = CO2e for CH4= CO<sub>2</sub>e for N<sub>2</sub>O= Natural Gas

Subpart N CO2 Calculation Methodology for Use of Carbonate-Based Raw Materials

For purposes of projected actual GHG emissions for the facility, the CO2 emissions are calculated using the projected usage of each carbonate-based material charged to each furnace in a year.

| metric tons        |         |  |
|--------------------|---------|--|
| 16,937             |         | * EF; * F;   |
| E <sub>co2</sub> = |         | $\sum_{i=1}^{n} MF_i * \left( M_i * \frac{2000}{2205} \right) * E$ |
|                    | Eq. N-1 | $E\cos = \sum_{i=1}^{n} MF_i$                                      |

 $E_{\rm CO2}$  = Process emissions of CO<sub>2</sub> from the furnace (metric tons) n = Number of carbonate-based raw materials charged to the furnace

Annual average mass fraction of carbonate-based mineral "" in carbonate-based raw material "" (percentage, expressed as a decimal) MF<sub>1</sub>= NOTE: a value of 1.0 can be used as an alternative to data provided by the raw material supplier.

M<sub>1</sub> = Annual amount of carbonate-based raw material "i" charged to furnace (tons)

EF<sub>1</sub> = Emission factor for carbonate-based raw material "", (metric ton CO<sub>2</sub> per metric ton carbonate-based raw material as shown in Table N-1 to Subpart N) 2000/2205 = Conversion factor to convert tons to metric tons

F<sub>i</sub>= Fraction of calcination achieved for carbonate-based raw material ";" assume to be equal to 1.0 (percentage, expressed as a decimal)

|   |                              | The mass fraction of carbonate-based mineral in the raw | material (MF) was conservatively assumed to be 100% | to estimate emissions.                   |
|---|------------------------------|---|---|--|
| Charged to<br>Furnaces #3   | 13,968                       | 0   |   | 16,642                                   |
|   | 14,951                       | 0   |   | 17,814                                   |
| Tons/Year Charged Tons/Year Charged to Furnace #1 to Furnaces #2                      | 19,938                       | 0   |   | 23,857                                   |
| CO <sub>2</sub> Emission Factor<br>(metric tons CO <sub>2</sub> /metric ton material) | 0.440                        | 0.477   |   | 0.415                                    |
| Raw Material  | Limestone- CaCO <sub>3</sub> | Dolomite- CaMg(CO <sub>3</sub> ) <sub>2</sub>           | Sodium-carbonate/                                   | soda ash-NA <sub>2</sub> CO <sub>3</sub> |

\* Projected annual usage based on baseline usage x projected glass pull rate/baseline annual average glass pull rate.

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& #2 & #3 Modifications e Emission Calculations

Saint-Gobain Containers, Inc.

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| >   |  |              |              | Dolton Furnace #1 8  |
|---|--|--------------|--------------|--|
|   |  |              |              | Projected Actual CO2e  |
|   | Signature: MMW   |              |              | PG   |
|   | Checked by: JGB/BED  | Q:           |              |  |
| Distributor   | Dietal bud out Econhand had a har COO 00 COO 70                                  | 40           |              |  |
| Subpart C Tier 1 CC   | Subpart C Tier 1 CO <sub>2</sub> Calculation Methodology (Eq. C-1)               | (Ea. C-1)    |              |  |
| CO <sub>2</sub> = 1x10 <sup>-3</sup> * Fuel * HHV * EF                    | HHV * EF   | `            |              |  |
| Natural Gas   |  |              |              |  |
|   | CO2 =  | 20,660.45    | metric tons  |  |
|   | Fuel =   | 379,059,160  | scf          | (based on projected actual annual production)                              |
|   | HHV =  | 1.028E-03    | MMBtu/scf    | (default value from Table C-1)   |
|   | EF =   | 53,02        | kg CO2/MMBtu | (default value from Table C-1)   |
| Subpart C CH4 and   | Subpart C CH <sub>4</sub> and N <sub>2</sub> O Calculation Methodology (Eq. C-8) | Jy (Eq. C-8) |              |  |
| CH <sub>4</sub> or N <sub>2</sub> O = 1x10 <sup>-3</sup> * Fuel *HHV * EF | * Fuel *HHV * EF   |              |              | CO <sub>2</sub> e = Emissions in metric tons/yr * Global Warming Potential |
| Natural Gas   |  |              |              |  |
|   | CH4=   | 0.39         | metric tons  |  |
|   | CO <sub>2</sub> e for CH <sub>4</sub> =  | 8.18         | metric tons  | GWP <sub>CH4</sub> = 21  |
|   | N <sub>2</sub> O =   | 0.04         | metric tons  |  |
|   | CO <sub>2</sub> e for N <sub>2</sub> O=  | 12.08        | metric tons  | GWP <sub>N2O</sub> = 310   |
|   | Fuel =   | 379,059,160  | scl          | (based on projected actual annual production)                              |
|   |  | 1.028E-03    | MMBtu/scf    | (default value from Table C-1)   |
|   | EF <sub>CH4</sub> =  | 1.00E-03     | kg CH4/MMBtu | (default value from Table C-2)   |
|   | EF <sub>N2O</sub> =  | 1.00E-04     | kg N2O/MMBtu | (default value from Table C-2)   |

Subpart C Calculation Methodology for CO2 from Sorbent (Eq. C-11) CO<sub>2</sub> = 0.91 \* Sorbent Use \* R \* [MW<sub>CO2</sub> / MW<sub>sorbend</sub>] Soda Ash Scrubbing of SO2

metric tons (based on projected actual annual production) [mol CO $_2$  released / mol SO $_2$  captured] 229 607 1.0 44 105.99 MW<sub>Na2CO3</sub> CO2 = Sorbent Use = E E

New emergency generator CO<sub>2</sub>e =

Subpart C Tier 1 CO $_2$  Calculation Methodology (Eq. C-1b)  $\rm CO_2 = 1 \times 10^{-3} \star Fuel ^{2} EF$ 

(based on projected actual annual production) (default value from Table C-1) metric tons MMBtu kg CO2/MMBtu 95 1,280 73.96 CO<sub>2</sub> = Fuel = EF =

Subpart C CH4 and N2O Calculation Methodology (Eq. C-8b) CH4 or N2O = 1x10^3 \* Fuel \* EF

CO<sub>2</sub>e = Emissions in metric tons/yr \* Global Warming Potential

GWP<sub>NDO</sub> = 310
(based on projected actual annual production)
(default value from Table C-2)
(default value from Table C-2) 21 GWP<sub>CH4</sub>= kg CH4/MMBtu kg N2O/MMBtu metric tons MMBtu metric tons metric tons metric tons 0.08 0.00077 0.24 1,280 3.00E-03 6.00E-04 0.00384 N<sub>2</sub>O = CO<sub>2</sub>e for N<sub>2</sub>O= Fuel = EF<sub>CH4</sub> = EF<sub>N2</sub>O = EF<sub></sub> CH4= CO<sub>2</sub>e for CH<sub>4</sub>= Diesel

# Appendix C

Approval of Request to Use Alternative Control Technology